

**WINSTON LEE
ATTORNEY AT LAW
20 VESEY STREET ~ SUITE 400
NEW YORK, NEW YORK 10007**

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**Tel. (212)267-1911
Fax. (212)964-2926**

September 4, 2018

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

FILED ECF

Re: United States v. Giacomo Illare
02 Cr. 498 (JMF)

Dear Judge Furman:

I am C.J.A. counsel for Giacomo Illare, a defendant in the above-referenced indictment.

I write to request the appointment of Dorea Silverman, Esq., as associate counsel in the above-referenced case pursuant to the Criminal Justice Act, 18 U.S.C. 3006(A).

The instant indictment charges Mr. Illare, inter alia, with conspiracy to commit securities, mail, and wire fraud, in violation of federal laws.

The discovery in this case includes thousands of documents. In addition, the particular facts and legal issues presented by this case require legal research and investigation. Consequently, Ms. Silverman's assistance is necessary for me to provide effective representation of Mr. Illare. Under my supervision, Ms. Silverman will assist with review of materials, legal research, preparation of pre-trial motions and submissions to the Court, and communications with defendant. Moreover, Ms. Silverman's assistance will allow me to provide effective representation with respect to various aspects of the case at a lesser rate of compensation than mine, and will allow me to allocate my time to additional important matters related to the representation of Mr. Illare.

Ms. Silverman has considerable experience representing defendants in a wide range of federal criminal cases, including RICO conspiracies, drug offenses and complex white-collar cases. Ms. Silverman graduated in 2009 from Cardozo Law School, where she was an editor of the Law Review and was competitively selected to the Criminal Defense and Criminal Appeals Clinics. Ms. Silverman previously practiced with a prominent white-collar defense firm, where she worked on several high profile cases. Ms. Silverman has previously been appointed as associate counsel, pursuant to the Criminal Justice Act, to assist me in the Southern District of New York. She has also been appointed as associate counsel and served as second chair attorney at trial for other C.J.A. Panel attorneys in the Southern and Eastern Districts of New York in cases that involved charges similar to the instant case. Accordingly, Ms. Silverman is very familiar with the mandates and obligations for C.J.A. appointed counsel.

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I therefore request that Your Honor authorize the appointment of Ms. Dorea Silverman Esq., 80 Broad Street, Suite 1900, New York, N.Y. 10004, as associate counsel, pursuant to the Criminal Justice Act, 18 U.S.C. 3006(A), for 50 hours of work at the rate of \$90 per hour, with leave to apply to the Court for additional hours if needed. Ms. Silverman's assistance is necessary to insure the continued provision of effective representation to Mr. Illare going forward and it will at the same time reduce the total amount of C.J.A. funds expended in this case.

I thank the Court for its consideration of this application.

Respectfully submitted,

/s/

WINSTON LEE